

Thomas Dowd
Administrator, Office of Policy Development and Research
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue, NW, Room N-5641
Washington, DC 20210

RE: RIN 1205-AB55 (H-2A Final Rule Suspension Proposal)

Dear Mr. Dowd:

I am writing to express my opposition to the Department's proposal to suspend the H-2A Final Rule for nine months. As a farmer, I urge the Department to withdraw this proposal.

Suspending the H-2A Final Rule will increase confusion regarding the program and frustrate farm budgets and business plans. It could also result in some farmers who use the H-2A program becoming vulnerable to wage discrimination lawsuits. The Final Rule was adopted using proper rulemaking procedures and H-2A users relied on this regulatory framework as they made plans for the 2009 growing season. The Department's proposal will disrupt many farming operations in North Carolina, which has the largest number of H-2A users in the nation, at precisely the wrong time.

Again, I urge the Department to withdraw this misguided proposal to suspend the H-2A Final Rule. Thank you for your attention to my comments.

Sincerely,

Late Pope